Mill Roseman for Philip Morris 3/16/83
Draft of letter on Waxman bill -- marketing executive

Dear _____:

The bill introduced to the Congress by Representative Waxman, H.R. 1824, is allegedly intended to educate American consumers about the purported dangers of cigarette smoking. Overlooking the fact that these matters are still very much in debate among scientific and medical authorities, it appears to me that the methods it prescribes to accomplish this questionable purpose are clearly both ineffective and indicative of a critical failure to understand consumer behavior.

As a marketing executive with many years of experience in dealing with consumer response, I am forced to the conclusion that these measures are advocated either as the result of ignorance in this area, or are in reality an effort to regulate and prohibit, rather than educate.

The bill would impose stringent, burdensome regulations on the American tobacco industry, with respect to prescribed labeling on both packages and advertisements. It would also cause the regulatory authority to enter the field of radio and television advertising, all with the supposed intent of advising consumers about the alleged dangers of cigarette smoking.

However, every study conducted on this matter demonstrates that this effort would be redundant. As Dr. Roger Blackwell of Ohio State University testified in the Congress just last year, this awareness is already essentially universal. The 1978 Gallup Poll Opinion Index (cited in the 1981 FTC staff report on cigarette advertising) showed that fully 90 per cent of the respondents already believed that smoking is hazardous to health. What Mr. Waxman's renewed effort to intensify government regulations manifests is a lack of understanding of the difference between awareness and behavior. Those Americans who smoke do so because they choose to, not out of lack of awareness.

Further, it has been demonstrated clearly that the proposed measures, punitive labeling and advertising regulation and rotating warning label systems, simply do not work. This has been the conclusion reached in countries where these approaches have been tried, both in England and in the Scandinavian countries. British authorities, in fact, decided to revert to a single label system, similar to the current practice in the United States, after experimenting with the rotating procedure advocated by H.R. 1824.

The sponsors of this legislation cannot, in my judgment, be unaware of these marketing facts, and I must therefore conclude that their intent is not education by harassment of both the industry and the consumer.

2023724966

Sincerely,

Source: https://www.industrydocuments.ucsf.edu/docs/xtxj0000